

Writer's Direct: (213)486-8046
Writer's Email: rkim@hptylaw.com

June 3, 2016

VIA FACSIMILE

South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
Fax: 909-396-3330

PublicRecordsRequests@aqmd.gov

Re: Freedom of Information Act Request

Pilar Alfaro, et al. v. Pneumo Abex LLC, et al.

Los Angeles County Superior Court Case No. BC559632 (JCCP4674)

Our Client: Maremont Corporation

To Whom It May Concern:

We are requesting the disclosure of the following records pursuant to the California Public Records Act (Government Code section 6250, *et seq.*), *within the next ten business days*. All requested records pertain to the following locations:

- **Pep Boys, 2415 S. Vineyard Ave., Ontario (from 1995-2004);**

(1) Any records or documents¹ pertaining to the practices, safety procedures, construction, maintenance, rebuilding, and/or repair/remodeling work at the location above, which in any way involved asbestos.

¹ The term "record" and the term "document" are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations, violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in the South Coast Air Quality Management District's possession, custody, or control or known or believed by the you to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.

(2) Any records or documents identifying any and all persons, contractors, or other entities who is involved in the practices, safety procedures, construction, maintenance, rebuilding, and/or repair/remodeling work at the location above, which in any way involved asbestos.

(3) Any records or documents pertaining to any asbestos abatement work performed at the location above.

(4) Any records or documents regarding research, investigations, air testing, reports and/or study data from air testing and air sampling which measured the amount of asbestos fiber either in the ambient air and/or released when asbestos was used, machined, operated, or otherwise disturbed at the location above.

(5) Any records, documents, or letters from South Coast Air Quality Management District pertaining to warnings, citations, or violations at the location above, which in any way involved asbestos.

(6) Any records or documents, including but not limited to reports, studies, and/or secondary research provided by South Coast Air Quality Management District at the location above, which addressed the issue of health hazards created by or associated with exposure to asbestos.

(7) Any written communication from South Coast Air Quality Management District and/or any of its regulatory agencies at the location above, which in any way involved asbestos.

Government Code section 6253 allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt, please provide me with the remainder of the documents. If you withhold documents you determine to be exempt from release, please justify withholding of those records by demonstrating that the records are exempt or that the public interest in confidentiality outweighs the public interest in disclosure. (Gov. Code. § 6255). We reserve the right to appeal any such determination.

We agree to pay the reasonable costs involved in retrieving and copying the records requested. If there are any fees for searching or copying these records, please inform me if the cost will exceed \$50.00. This information is not being sought for commercial purposes.

As provided in section 6253(c), we expect to receive a reply to our request within ten (10) business days. If you have any questions, please feel free to contact me at (213)486-8046 or by e-mail at **rkim@hptylaw.com**.

Sincerely,

**HAWKINS PARNELL
THACKSTON & YOUNG^{LLP}**



Raymond Kim
Paralegal